

SRI v. ISS and Symantec

(Amended) Exhibit 11 to the Proposed Pretrial Order

**WITNESSES SRI INTENDS TO CALL TO TESTIFY
EITHER IN PERSON OR BY DEPOSITION PURSUANT TO LR 16-4(d)(7)**

SRI presently intends to call the following witnesses either “live” or by deposition in its case-in-chief. SRI cannot anticipate all of the objections and issues that may arise as SRI presents its case. SRI expects in fact to call fewer witnesses as defendants narrow or withdraw their noninfringement contentions, which SRI expects given the minimal proof that defendants can properly present regarding the issue of infringement. Those witnesses whose names are followed by “(SRI)” can be reached through counsel for SRI. The names of individuals affiliated with each defendant or who were represented at deposition by defendants’ counsel are followed by “(Symantec)” or “(ISS)” and can presumably be reached through litigation counsel. SRI also reserves the right to call anyone appearing on either of Symantec’s or ISS’s witness lists.

Patrick Lincoln (SRI)
Phillip Porras (SRI)
Alfonso Valdes (SRI)
George Kesidis (SRI, expert) .
692 Tanager Drive
State College, PA 16803
(814) 238-1516
Specialty: Cyber security and network intrusion detection
Paul Griswold (ISS)
Robert McEwin (ISS)
Bernard Palmer (ISS)
Jim Pruss (ISS)
Holly Stewart (ISS)
Peter Tosto (ISS)
Paul Agbabian (Symantec)
Jeremy Bennett (Symantec)
Robert Geiger (Symantec)
Brian Hernacki (Symantec)
Howard Lev (Symantec)

Robert Allen
462 South Fourth St. Suite 1100
Louisville, Kentucky 40201

Robert Ferrill
One HealthSouth Parkway
Birmingham, Alabama 35243

Douglas Song
1290 Bardstown Trail
Ann Arbor, Michigan 48105

SRI's rebuttal case on the issues of validity and enforceability will be responsive to the evidence presented by defendants. In its notice pursuant to 35 U.S.C. § 282, ISS has identified 248 separate prior art references while Symantec has identified 519 separate references in support of Defendants' numerous potential theories of invalidity and unenforceability. Moreover, because this list of witnesses is being exchanged simultaneously with defendants, SRI is unable to know from which witnesses it will be able to elicit testimony on cross examination. As such, SRI cannot accurately identify the witnesses it may call either live or by deposition in its rebuttal case, and reserves the right to call anyone appearing on either Symantec's or ISS's witness list. SRI therefore identifies the following individuals which it may call in its rebuttal case, but expects to call far fewer witnesses.

George Kesidis (expert) .
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Richard Abramson (SRI)
Phillip Porras (SRI)
Alfonso Valdes (SRI)
Keith Skinner (SRI)
Patrick Lincoln (SRI)
Robert Graham (ISS)
Danny Eidson (ISS)
Holly Stewart (ISS)
Jim Innes (ISS)
Joe Kleinwaechter (ISS)
Thomas Noonan (ISS)

Enrique Salem (Symantec)
Sandeep Kumar (Symantec)
Jeff Brobst (Symantec)
Col. Timothy Gibson
4109 John Trammel Court
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